



THE CITY OF NEW YORK  
LAW DEPARTMENT

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January 6, 2020

**VIA ECF**

Hon. Vernon S. Broderick  
United States District Judge  
United States District Court, Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

Re: Eslam Hassan v. Captain John Doe, et al., 19-CV-10208 (VSB)

Your Honor:

I am the attorney in the Office of the Corporation Counsel of the City of New York assigned to the defense of the above matter. I respectfully write in response to the Court's Order dated November 6, 2019, whereby this Office was directed to ascertain the full names and badge numbers for the Jane and John Doe defendants and the addresses where those defendants may be served. I now respectfully request a brief two week enlargement of time until January 20, 2020 to fully comply with the Court's Valentin Order. This is the first such request in this matter. This Office was unable to obtain consent from plaintiff, who appears in this matter pro se, as he is presently incarcerated and cannot be reached expeditiously. The foregoing request will not affect any other scheduled dates in this matter.

By way of background, plaintiff filed the Complaint on October 31, 2019, alleging that on October 27, 2016, his constitutional rights were violated while he was detained at the Otis Bantum Correctional Center on Rikers Island. See Dkt. No. 2. On November 6, 2019, the Court ordered defendants City of New York and Warden Kenneth Stukes to waive service of summons.<sup>1</sup> See Dkt. No. 7. The Court further ordered the Office of the Corporation Counsel to provide the identities of the Jane and John Doe defendants. Id. Pursuant to the Court's Order, upon information and belief, the following Jane and John Doe defendants are hereby identified as: Correction Captain Sedeke Kamara, Shield No. 1737 and Dr. Igwe Okechukuru, MD.

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<sup>1</sup> Defendants City of New York and Warden Kenneth Stukes waived service of summons.

To date, the New York City Department of Correction has been unable to identify the individuals identified by plaintiff as the four John Doe correction officers involved with plaintiff's alleged strip search on October 27, 2016, between 6:00 – 11:00 p.m. and the Jane Doe nurse who had allegedly had a medical visit with plaintiff on October 27, 2016, between 9:30 p.m. – midnight. Additional time is needed to attempt to identify the four individuals plaintiff names as Correction Officer John Does and Nurse Jane Doe using the information provided by plaintiff in the Complaint – such as the date, time, and location of the incident. Similarly, plaintiff describes one of the Correction Officer John Does as "dark skin color." DOC requires additional time to search its records of the Correction Officers who were on duty at the date and time specified by plaintiff in his Complaint to determine whether any match this description.

This Office received plaintiff's medical records from Correctional Health Services on December 19, 2019. Plaintiff's medical records are voluminous, and consist of nearly 900 pages spanning a three year period of plaintiff's incarceration, from 2016 to 2019. Plaintiff's medical records were subject to extensive redaction due to the restrictions that plaintiff placed on certain areas of his medical information. For example, plaintiff did not elect to release any Alcohol/Drug Treatment and HIV-Related Information that may be contained within his medical records; thus, any Alcohol/Drug Treatment and/or HIV-Related Information were redacted accordingly. In the course of reviewing plaintiff's medical records from Correctional Health Services, upon information and belief, I located identifying information for two of the Jane and John Doe defendants. As of this writing, I have been unable to locate identifying information for the remaining Jane and John Doe defendants. I am still in the process of reviewing plaintiff's medical records in an effort to locate additional identifying information.

Accordingly, I respectfully request a brief two week enlargement of time until January 20, 2020 to ascertain the full names and service addresses of the remaining Jane and John Doe defendants who were allegedly involved in the incident the Otis Bantum Correctional Center on Rikers Island on October 27, 2016.

Thank you for your consideration herein.

Respectfully submitted,



Stefano Perez  
Assistant Corporation Counsel  
Special Federal Litigation Division

**BY FIRST-CLASS MAIL**

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